EXHIBIT 2

FILED UNDER SEAL

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs. No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING,
INC.,

Defendants.

_____/

WAYMO & UBER CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF GREGORY KINTZ

SAN FRANCISCO, CALIFORNIA

WEDNESDAY, APRIL 26, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~
CSR LICENSE NO. 9830
JOB NO. 2592507

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Q Okay. What do you mean by that? 11:44

A Well, [redacted] but 11:44

does not have to be. 11:45

Q Okay. In what instances would it [redacted]? 11:45

A Using general principles, it would be [redacted] 11:45

Q And under what circumstances would it [redacted] 11:45

A There may be cases where you might want to [redacted] you could do that. 11:45

Q Okay. But generally, if you're looking to [redacted]; correct? 11:46

MR. JAFFE: Objection; form. 11:46

THE WITNESS: Correct. 11:46

MR. KIM: Q. So, taking a look at this 11:46

diagram, I see on page 15 of Exhibit 1034, there is 11:46

[redacted] 11:46

Using the Fuji [redacted] information, I was able to determine [redacted]. And, from that, I was able to [redacted]

Q Okay. And that's [redacted] [redacted]-- on the bottom of page 5?

A That is 15?

Q Yes.

A Yes.

Q Okay. And after [redacted]?

A Using the -- again, the same [redacted] file from the Fuji board in the Gorilla e-mail, that also contains [redacted].

And I was able to [redacted]

MR. KIM: Okay. Let's go ahead and mark this as No. 1037.

(Document marked Exhibit 1037 for identification.)

MR. KIM: Q. Do you recognize Exhibit

[redacted], what did you do next? 12:01

A I then compared [redacted] 12:01

[redacted] 12:02

[redacted] Excuse me. 12:02

Q And the [redacted] 12:02

A Correct. 12:02

Q Okay. And that's based on your calculation 12:02

of [redacted] for the 12:02

Fuji board; correct? 12:02

A That is correct. 12:02

Q So, is it fair to say that if your 12:02

calculation of [redacted] for Fuji 12:02

was incorrect, that [redacted] would also be different; 12:02

correct? 12:02

A Yes. 12:02

Q I'd like to turn to -- back to the reply 12:02

declaration. 12:03

A (Witness complies.) 12:03

Uh-huh. 12:03

Q And direct your attention to paragraph 5. Do 12:03

you see where it says: 12:03

"My visual inspection of the Fuji device on 12:03

A F T E R N O O N S E S S I O N

1:05 P.M.

THE VIDEOGRAPHER: We are back on the record at 1:05 p.m.

MR. KIM: Q. Mr. Kintz, we were talking about [redacted]. And I wanted to ask you what you meant by [redacted] in your declaration, for example, in paragraphs 4 and 5 which we had been discussing.

A The definition of [redacted]

Q Okay. And so, if [redacted]?

A Yes, I would agree with that statement.

Q Okay. And is it also your testimony that if [redacted]?

MR. JAFFE: Excuse me. Objection; form.

THE WITNESS: In a more broad definition of

[redacted], yes, that would. 13:07

I believe, in the context of the Trade Secret 13:07
that we're discussing right now, no, because that 13:07
[redacted]. 13:07

MR. KIM: Q. So, just to make sure I -- I 13:07
understand your answer, if you had [redacted]
[redacted]
[redacted]
[redacted]
[redacted]
[redacted]
[redacted]
[redacted]
[redacted]? 13:08

A Yes. 13:08

MR. JAFFE: Objection; form. 13:08

Just give me a second to object, please. 13:08

THE WITNESS: Yeah. 13:08

MR. JAFFE: Thank you. 13:08

THE WITNESS: Yes, within the context of your 13:08
statement, yes. 13:08

MR. KIM: Okay. So I'd like to mark this as 13:08
1038, I believe. 13:08

(Document marked Exhibit 1038 13:09
for identification.) 13:09

MR. KIM: Q. Do you recognize Exhibit 1038? 13:09

your objection. Please stop, or we'll move to strike his declaration. 14:12

MR. JAFFE: I'm going to just object again. 14:12

MR. KIM: That's under your interpretation of Judge Alsup's standing order. I'm warning you, stop. 14:12

MR. JAFFE: I disagree. 14:12

MR. KIM: Q. Can you answer the question? 14:12

A To successfully produce this document here, I needed to have the [redacted] between the Waymo boards and the Fuji board. 14:12 14:13

So I did compute [redacted] in preparing this figure. 14:13

Q Did you quantify or calculate the correspondence between [redacted] 14:13

MR. JAFFE: Objection; form. 14:13

THE WITNESS: So at the time I had -- did this analysis, I had the [redacted] data for the one Fuji board, and I had the [redacted] from the Waymo boards. 14:13

[redacted] 14:14

MR. KIM: Q. What are the scaling differences you're referring to? 14:14

your report; correct? 14:15

A The Excel spreadsheet that did that 14:15
calculation was part of a set of files that I used and 14:15
prepared for the original declaration. 14:15

Q Are they mentioned in your declaration? 14:15

A Insomuch as there is a computed calculation 14:15
here. 14:15

Q But where -- where is that spreadsheet 14:15
referenced in the list of materials considered? 14:15

MR. JAFFE: Objection; form. 14:15

THE WITNESS: It was a simple derivation of 14:15
the assembly and fabrication documents that were 14:16
provided as part of the Fuji PCB. 14:16

MR. KIM: So Counsel, we request that those 14:16
spreadsheets that he relied on in preparing his 14:16
declaration be produced immediately. 14:16

MR. JAFFE: So just to briefly respond, I 14:16
don't think that's a fair summary of what he just 14:16
testified about. But we'll take your request under 14:16
advisement. 14:16

MR. KIM: Q. Mr. Kintz, Waymo didn't come up 14:17
with the idea of having 64 diodes in a LiDAR; correct? 14:17

A No. That existed out in the public domain. 14:17

MR. JAFFE: So just as a brief question here, 14:17
if you're changing topics, if you don't mind if we 14:17

A With that limited restriction on the manufacturing tolerances, there will be some variation in [redacted]. 14:29

Q And in some circumstances, due to manufacturing tolerances, the laser diode could [redacted]; correct? 14:29

A In that case where there are manufacturing tolerances being considered, that is a possibility. 14:29

Q We had -- in looking at paragraph 40, where you mention mounting a cylindrical lens in front of a laser diode to [redacted] 14:29

Do you see that? 14:29

A Yes. 14:30

Q Are you familiar with the term "fast-axis lens"? 14:30

A Point of clarification. Fast axis? 14:30

Q Fast-axis, A-X-I-S, collimation lens. 14:30

A Yes. 14:30

Q What is that? 14:30

A It is a cylindrical lens system that is commonly placed in front of laser diodes for doing collimation of the laser diode system. 14:30

Q So Waymo wasn't the first to invent or 14:30

discover the use of a fast-axis collimation lens in the context of LiDARs? 14:30

MR. JAFFE: Objection; form. 14:30

THE WITNESS: I'm aware of people using fast-axis collimation lenses in a wide range of laser diode collimation systems. 14:30

MR. KIM: Q. The Velodyne 64, in fact, used FAC lenses in front of its diodes; correct? 14:31

A Based on the information that is presented in Figure 7, it appears that they use a fast-axis lens. 14:31

Q And do you see the fast-axis collimation lens in Figure 7? 14:31

A Yes. 14:31

Q Okay. Can you label that, please. You can just -- you can label it "FAC" for short. 14:31

A (Witness complies.) 14:31

Okay. 14:31

Q Okay. And you're understanding that for the Velodyne 64, the purpose of that FAC lens would be to pre-collimate the light emitted from the laser diode; correct? 14:31

A Correct. 14:32

Q And would it also be for the purpose of [redacted] 14:32

inspected. 14:40

What's the benefit of having [redacted] for the GBr3 board? 14:41

A [redacted] 14:41

Q And what other benefit is there for having a [redacted] for the GBr3? 14:41

A For the GBr3 specifically, the benefit is associated with [redacted] 14:41

Q Okay. And what other benefits are there for the GBr3? 14:41

A I am not aware of any other benefits for the GBr3 board at this time. 14:42

Q And are those -- so I -- I heard two primary benefits for having [redacted] for the GBr3; is that fair? 14:42

A Yes. 14:42

Q Would those two benefits also apply if you had [redacted]? 14:42

A Yes. 14:42

Q Would they apply if you had [redacted] 14:42

[redacted] correct? 14:45

A I actually -- 14:45

MR. JAFFE: Sorry. Objection; form. 14:45

Go ahead. 14:45

THE WITNESS: Actually, I disagree. 14:45

[redacted] 14:45

So it's clear that even [redacted] 14:45

MR. KIM: Q. So would [redacted] ? 14:46

A Yes, under all of the considerations of the [redacted] yes. 14:46

Q And assuming that [redacted] 14:46

correct? 14:46

A Yes, given those mathematical assumptions. 14:46

Q So if you can turn to your -- the Trade Secret List that we've been referring back to, Trade Secret No. 7. 14:47

A (Witness complies.)
Yes. 14:47

Q It's not your testimony that Trade Secret 7 requires [redacted]; is it? 14:48

A [redacted] 14:48

Q But it doesn't say [redacted]; correct? 14:48

A No, there is no [redacted] 14:48

It's just surprising that [redacted] 14:48

Q How do you know that [redacted]? 14:48

A I was told that -- or that information is in one of the declarations of one of the Waymo engineers. 14:49

Q And you relied on that declaration? 14:49

A Yes. 14:49

Q Do you know whose? 14:49

A I can pull that up because that's referenced in my -- let's see -- in my second declaration. 14:49

declaration, paragraph 40. And actually, let's move ahead to paragraph 43. 15:03

A (Witness complies.) 15:03

Q Do you see in the first sentence where you say: 15:04

"Moreover, both Liu and Schultz dissertation teach away from [redacted]." 15:04

A Yes. 15:04

Q What is a [redacted]? 15:04

A Depending on the application of the laser diode, either single emitter device or laser diode bar, [redacted] 15:04

Q For the GBr3, what would be [redacted]? 15:04

MR. JAFFE: Objection; form. 15:04

THE WITNESS: Without having gone through computations of the -- [redacted] 15:05

However, in the deposi- -- in the declarations of the Google engineer, Pierre Droz, they 15:05

Q What about [redacted]? 15:07

A Again, you're asking me to do calculations 15:07
that I don't have information available to me in terms 15:07
of the detailed design properties of the system. 15:07

Q You know, earlier we were looking at the 15:07
Trade Secret No. 7, and you confirmed there was no 15:07
requirement of [redacted]. 15:07

Do you recall that? 15:07

A Yes. 15:08

Q Where does it say in Trade Secret 7 that the 15:08
[redacted]? 15:08

A The significance in the Trade Secret is the 15:08
[redacted] 15:08

Q But where does it [redacted] 15:09
[redacted]? 15:09

A Trade Secret No. 7 doesn't have [redacted] 15:09
[redacted]. 15:09

(Document marked Exhibit 1048 15:09
for identification.) 15:09

MR. KIM: Okay. I'd like to hand you 15:09
deposition Exhibit No. 140 -- 1048. 15:09

MR. JAFFE: Can I get a copy, please? 15:09

Q So it seems to be distinguishing the '190 patent disclosure and possibly the PanDAR paper -- it's unclear -- on the grounds that what's disclosed in the '190 patent and/or the PanDAR paper is not a single device. 16:04 16:04 16:04 16:05 16:05

And my question is: Earlier when we were discussing the PanDAR device, you had mentioned that it was two stacked Velodynes; right? 16:05 16:05 16:05

And I think that's depicted in Figure 1 which we were talking about earlier. 16:05 16:05

A Yes. 16:05

Q So -- so with the understanding that PanDAR is describing what you described as two separate devices stacked on top of each other -- 16:05 16:05 16:05

A Well, actually, I think we can look at the photograph -- 16:05 16:05

Q Yeah. 16:05

A -- on Figure 1 and see -- 16:05

Q Yeah, that's what I'm looking at, too. 16:05

A -- that it is a single device that has two optical subsystems on it. 16:05 16:05

Q Oh, you would characterize this as a single device? 16:05 16:05

A This is the PanDAR system that is a single device. 16:05 16:05

[redacted] 16:10

So again, I have to say necessarily because it may not be a straightforward task to reduce that to a single device. 16:10

MR. KIM: Q. Wouldn't it be fairly simple to just arrange the boards that are distributed across two optical cavities in the PanDAR device into a single cavity? 16:10 16:11 16:11

MR. JAFFE: Objection; form. 16:11

THE WITNESS: Without knowing the internal details of the -- of the 32-unit Velodyne systems, that may or may not be possible. 16:11 16:11 16:11

But we can actually look at the Velodyne '190 patent and see that there's not a lot of room between their current set of emitters to just add more boards. 16:11 16:11 16:11 16:11

MR. KIM: Okay. 16:11

Q Aside from space constraints, what else would prevent you from just adding more boards in a single cavity? 16:11 16:11 16:11

A Well, two other areas that immediately jump out at me as an engineer. 16:11 16:12

[redacted] 16:12

[redacted] 16:12

Q What else? 16:12

A We mentioned [redacted]

[redacted] 16:12

Q What about optically? 16:12

You wouldn't have to recalculate all the [redacted]

[redacted]; right? 16:12

You could just take [redacted]

[redacted] and apply it to a single cavity? 16:13

MR. JAFFE: Objection; form. 16:13

THE WITNESS: So you're really making a very 16:13

hypothetical situation right now, and now detailed 16:13

designs that's unclear to me whether I can make an 16:13

accurate conclusion on this. 16:13

It not only depends on [redacted]

[redacted] 16:13

So I don't think there is a clear answer to your question. 16:13

MR. KIM: Q. It wouldn't be a simple modification to just go from these two separate cavities and to put all 64 boards and diodes into a single cavity? 16:13

MR. JAFFE: Objection; form. 16:14

THE WITNESS: Again, I don't -- with all of the complexity of engineering, I don't think you can make a broad brush statement that says, Oh, this would just be a simple thing to do. 16:14

MR. KIM: Q. So GBr3 has [redacted]; correct? 16:15

A Yes, that's correct. 16:15

Q And it has a single optical cavity? 16:15

A Yes, that's correct. 16:15

Q And the [redacted] for GBr3, that's [redacted]? 16:15

A That sounds correct. But I would prefer to look at a detailed specification to confirm that number. 16:15

Q All right. 16:16

I think you can go to the list of Trade Secrets and turn to -- let's see -- page 25. 16:16

A Okay. Nope, I don't need that anymore. 16:16

line 52, where it says: 16:30

"In some examples, each light source of the 16:30
plurality of light sources includes a respective lens, 16:30
such as a cylindrical or acylindrical lens. The light 16:30
source may emit an uncollimated light beam that 16:31
diverges more in a first direction than in a second 16:31
direction. In these examples, the light source's 16:31
respective lens may pre-collimate the uncollimated 16:31
light beam in the first direction to provide a 16:31
partially collimated light beam, thereby reducing the 16:31
divergence in the first direction." 16:31

Do you see that? 16:31

A I do see that. 16:31

Q Doesn't that describe a cylin- -- use of a 16:31
cylindrical or acylindrical FAC lens with a laser 16:31
diode? 16:31

A Yes, it does. 16:31

Q And here it refers to cylindrical or 16:31
acylindrical. 16:31

Do you know what the difference is between a 16:31
cylindrical and an acylindrical lens? 16:31

A The use in the patent of the terminology 16:31
"acylindrical" is not standard for optics. Normally, 16:32
the optical design program -- or a common optical 16:32
design program, Zemax, would refer to that as a 16:32

toroid-shaped lens. 16:32

Q Yet you're referring to an acylindrical -- 16:32

A Correct. 16:32

Q -- shape? 16:32

So just to make sure I've got the terminology right, an acylindrical FAC lens would be toroidal? 16:32

A And just to be specific, the definition of toroidal means that the radius of curvature in one principal direction is different than the radius of curvature in the other principal direction. 16:32

Q Okay. And a cylindrical FAC then would be non-toroidal; is that fair? 16:32

A Yes. It's the limit where one of the axes is constant cross section and has no radius of curvature, and the other one has a radius of curvature. 16:33

Q And you can define a acylindrical shape through a mathematical equation; correct? 16:33

A That's correct. 16:33

Q And an acylindrical shape can be defined through the use of a polynomial? 16:33

A Correct. 16:33

Q Whereas a cylindrical shape would not be defined by a polynomial; correct? 16:33

A In the one axis where there is curvature, that axis is actually usually defined by a polynomial. 16:33

MR. KIM: Okay. 17:12

Q So this patent discloses the use of holes, 17:12

tapered pins, screws, and cam surfaces, all four of 17:12

those, [redacted]; correct? 17:12

A That is correct. 17:12

Q Okay. You can put that aside. 17:12

So I believe earlier you testified that it's 17:13

your understanding that the manufacturing tolerances 17:13

for GBr3 is [redacted]? 17:13

MR. JAFFE: Objection; form. 17:13

THE WITNESS: Can you point to either in my 17:13

declaration or -- 17:13

MR. KIM: Q. I thought you said that during 17:13

the deposition, but you also said in paragraph 50 of 17:13

your reply brief. 17:13

A Okay. 17:13

MR. JAFFE: Are you talking about the reply 17:13

brief, you said? 17:13

MR. KIM: The reply declaration. 17:13

THE WITNESS: Okay. 17:14

(Complies.) 17:14

Yes. And this specifically references the 17:14

[redacted] 17:14

[redacted]

17:14

MR. KIM: Q. So if there's a [redacted]

[redacted]

17:15

A [redacted]

[redacted]

17:16

[redacted]

17:17

Q Okay. I'd like to move on to page 29 of your reply. 17:17

A (Witness complies.) 17:18

Q Down at the bottom you're discussing Trade Secret 48? 17:18

A Yes. 17:18

Q And what is that Trade Secret? 17:18

A So the Trade Secret as specifically written in the Trade Secret document -- list document, the Trade Secret claimed is: 17:18

[redacted] 17:18

Q Now, the use of a [redacted], that's known in the public; right?

MR. JAFFE: Objection; form.

THE WITNESS: There are many applications of [redacted]

MR. KIM: Q. And it's also known that you could use [redacted];

correct?

MR. JAFFE: Objection; form.

THE WITNESS: Yes. There are certainly references in the public domain that discuss the [redacted]

MR. KIM: Q. For a LiDAR application; correct?

A For a LiDAR application.

Q Okay. So the use of [redacted] that's not a Trade Secret; right?

A Right here. 17:26

Q You're referring to [redacted] 17:26

A [redacted] yes. 17:26

Q Okay. Let's move on to paragraph 58 in your reply declaration. 17:26 17:27

A (Witness complies.) 17:27

Yes. 17:28

Q So Trade Secret 10 is: 17:28

[redacted] 17:28

A That's correct. 17:28

Q What's the [redacted] covered by Trade Secret 10? 17:28

A It's the [redacted] 17:28

Q Now, I'm -- I want to know about the [redacted] 17:29

[redacted] that you're referring to? 17:29

Q Now, you said earlier [redacted]

[redacted]

[redacted]; right? 17:31

A That's right. So just to be specific, a 17:31

[redacted]

[redacted]

[redacted] 17:31

Q Okay. So who is [redacted] for 17:31

Waymo? 17:31

A I know they're a [redacted] and -- oh, 17:31

yes, [redacted] 17:31

Q Okay. So I'm a little confused, because in 17:31

Trade Secret -- the Trade Secret List, page 8, it 17:31

says: 17:31

[redacted]

[redacted]

[redacted]

[redacted] 17:32

Do you see that? 17:32

A You're on page 8? 17:32

Q Page 8. 17:32

A And Trade Secret -- 17:32

Q 10. 17:32

A -- 10. 17:32

MR. JAFFE: Same objection. 17:39

THE WITNESS: Again, I'm not aware of any other person using plastic FAC lenses in any application. 17:39

MR. KIM: Q. Can you turn to the '922 patent that we looked at previously. 17:39

A (Witness complies.) 17:41

Uh-huh. 17:41

Q Direct your attention to paragraph -- column 15, line approximately 50. 17:41

Do you see that? 17:41

A Yes. 17:41

Q So it says: 17:41

"In one example, cylindrical lens 504 is a microrod lens with a diameter of about 600 microns that is placed about 250 microns in front of aperture 506. The material of the microrod lens could be, for example, fused silica or a borosilicate crown glass, such as Schott BK7." 17:41

It goes on to say: 17:42

"Alternatively, the microrod lens could be a molded plastic cylinder or acylinder." 17:42

Do you see that? 17:42

A I do. 17:42

Q So it's known in the public that you could 17:42

have a molded plastic FAC lens for use with a diode in a LiDAR; correct? 17:42

A Yes. The -- there could be a molded glass lens. 17:42

However, the Trade Secret really here that we're talking about is [redacted] 17:42

Q Where does it talk about [redacted] 17:43

MR. JAFFE: Objection; form. 17:43

THE WITNESS: Well, the -- the Trade Secret [redacted] 17:43

MR. KIM: Q. And I thought we had previously discussed that in this list of Trade Secrets, it's just the last bullet that defines the scope of the Trade Secret? 17:43

A Yes. 17:43

Q Do you recall that? 17:43

A Yes. 17:43

Q Okay. Is there anything in that last bullet that talks about [redacted]? 17:43

A No. 17:43

Q Do you see any description there of any [redacted] 17:43

A No. 17:43

Q Did you opine on Trade Secret No. 19? 17:43

A Yes. 17:44

Q So again, the scope of Trade Secret 19 is defined by that last bullet point; correct? 17:44

A Correct. 17:45

Q And so the Trade Secret is [redacted] is that right? 17:45

MR. JAFFE: Objection; form. 17:45

THE WITNESS: There's more to the Trade Secret. The Trade Secret claimed is: 17:45

[redacted] 17:45

MR. KIM: Q. So the Trade Secret doesn't specify any particular type of [redacted]; correct? 17:45

A No. 17:46

Q And you're aware of vendors who sell [redacted] 17:46

diagrams? 18:54

MR. JAFFE: Same objection. 18:54

THE WITNESS: As I just stated, without knowing the internal circuitry of the components that are listed as MC40F10YMME, and whether or not that internal device contains inductors or inductor-like devices, I cannot make a determination. 18:54

MR. KIM: Okay. 18:54

Q You said you reviewed the 14,000 files downloaded by Mr. Anthony Levandowski in preparation for finalizing your opening declaration; correct? 18:54

A That is correct. 18:54

Q When you reviewed those 14,000 files, you didn't see [redacted]; did you? 18:54 18:55

MR. JAFFE: Objection; form. 18:55

THE WITNESS: The files that were downloaded by Andrew Levandowski included a wide range of laser programs at Google Waymo, one being [redacted] 18:55 18:55

However, the information is limited to the electrical schematics of the system and did not have any information on the optical configurations. 18:55

MR. KIM: Okay. 18:55

Q So that would be -- you -- you didn't see any 18:55

schematics for a LiDAR design with eight optical cavities? 18:55

A No, I did not. 18:55

Q And you didn't see any schematics for a LiDAR design that had 16 collimation lenses? 18:55

MR. JAFFE: Objection; form. 18:56

THE WITNESS: Again, the schematic files are electrical files, not optical files. So there was no information on lenses or optics. 18:56

MR. KIM: Q. And you didn't see any schematics that showed a diode-based design with multiple diodes on a board with separate transmit and receive lenses? 18:56

MR. JAFFE: Objection; form. 18:56

THE WITNESS: In the laser subdirectory of the files downloaded by Andrew Levandowski, there were multiple laser projects with the schematic information on those, but not the optical information. 18:57

So even though there were a wide range of files downloaded on a wide range of laser radar systems, there was not specific optical information that would allow me to answer that I did see this configuration. 18:57

MR. KIM: Q. Mr. Kintz, the Spider doesn't practice any of the Trade Secrets in your opening 18:57

declaration; correct? 18:57

A No, not that I'm aware of. 18:58

Q Okay. Going back to -- yeah. I think 18:58

earlier we were talking about [redacted]. 18:58

Do you recall that discussion? 18:58

A I do. 18:58

Q And at one point we were talking about a 18:58

reference that disclosed, in addition to the use of 18:58

guide holes, also the use of screws. 18:58

Do you recall that? 18:58

A Yes. 18:58

Q The use of screws to position PCB boards, 18:58

that was well known in the public; correct? 18:58

MR. JAFFE: Objection; form. 18:58

THE WITNESS: In this case, the screws had a 18:59

definitive function that is well beyond the normal use 18:59

of screws to just hold them down on a set of 18:59

standoffs. 18:59

In this case, the screws had a function as -- 18:59

wrong patent. Wrong patent. 18:59

MR. KIM: Let me just ask you a new question. 18:59

Q In your opinion, people would know that you 18:59

could position a PCB using screws; correct? 18:59

MR. JAFFE: Objection; form. 18:59

THE WITNESS: The attachment of PCBs to standoffs and other mechanical hardware is commonly used in designs. 18:59 19:00 19:00

MR. KIM: Okay. No further questions at this time. 19:00 19:00

MR. JAFFE: No questions. 19:00

THE VIDEOGRAPHER: This is the end of today's deposition of Mr. Gregory Kintz. We are off the record at 7:00 p.m. 19:00 19:00 19:00

The total number of media used was eight and will be retained by Veritext. 19:00 19:00

Thank you. 19:00

(WHEREUPON, the deposition ended at 7:00 p.m.) 19:00 19:00